Ken McCartney, #5-1335
The Law Offices of Ken McCartney, P.C.
P.O. Box 1364
Cheyenne, WY 82003-1364
Tel (307) 635-0555
Fax (307) 635-0585
Email bnkrpcyrep@aol.com

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF WYOMING

In re:	)	
	)	
JOHN CAMPBELL McTIERNAN, JR.	)	Case No. 13-20987
	)	
	)	Chapter 11
Debtor.	)	

APPLICATION FOR ORDER APPROVING EMPLOYMENT OF REAL ESTATE BROKER FOR THE ESTATE BY THE DEBTOR-IN-POSSESSION AND APPROVING FIVE PERCENT (5%) REAL ESTATE COMMISSION

TO the Honorable Peter J. McNiff, United States Bankruptcy Judge:

THE APPLICATION of the Debtor above named, respectfully represents:

1. That the Applicant is the Debtor in Possession in the pending Chapter 11 proceeding described above.

2. That a voluntary petition for relief under Chapter 11 of Title 11, United States Code, was filed herein on October 18th 2013, and it is continuing as a Chapter 11 proceeding.

3. That the Debtor owns a ranch near Dayton, Wyoming, which he did not plan to keep after filing for Chapter 11 relief. Its sale would significantly reduce his bank debt and is therefore desirable to the Debtor.

4. That the Debtor has conducted a search for a suitable agent to use in the sale of this ranch property. The Debtor has chosen Mr. John C. Pierce of Jackson Hole Sotheby's Realty, who is a suitably experienced, duly licensed real estate sales

broker who is licensed to sell real estate in Wyoming and qualifies as a professional person pursuant to 11 U.S.C. §327.

5. That it is necessary for real estate sales person to render services required of the estate in Bankruptcy Court.

6. That to the best of Applicant's knowledge, as Real Estate Sales Person, John C. Pierce has no adverse connections with the estate as Real Estate Sales Person for the estate or Real Estate Sales Person for the Debtor, no connections with the creditors or any other party in interest or their respective attorneys and accountants, the United States Trustee nor any employee of the United States Trustee, and that Debtor’s representation is not anticipated as a problem at this time.

7. That John C. Pierce does not represent nor hold an interest adverse to the estate in the matters upon which he is to be engaged herein, and his employment would be in the best interests of the estate.

8. Applicant proposes that the compensation of the Real Estate Sales Brokerage is pursuant to a standard 5% listing contract a copy of which is attached hereto as Exhibit A.

WHEREFORE, Applicant prays for the annexed Order for which no previous application has been made.

DONE this 24th day of June, 2014.

Respectfully submitted,

By: /s/ Ken McCartney
Ken McCartney, # 5-1335
The Law Offices of Ken McCartney P.C.
P.O. Box 1364
Cheyenne, WY 82003
Phone (307) 635-0555
Fax (307) 635-0585
bnkrpcyrep@aol.com